



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 29, 2020

**By ECF**

The Honorable Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 4/30/2020

Re: *American Civil Liberties Union Foundation v. United States Department of Justice et al.*, No. 19 Civ. 5483 (MKV)

Dear Judge Vyskocil:

This Office represents the Government in the above-referenced case brought under the Freedom of Information Act (“FOIA”). I write respectfully on behalf of the parties to update the Court on the status of this case, as previously directed. See Dkt. No. 32. On March 31, 2020, the Government completed its processing and release of thousands of pages of records. The parties have been subsequently discussing in good faith Plaintiff’s concerns about the Government’s search and assertion of FOIA exemptions, in an effort to narrow the scope of, or avoid entirely, further litigation. While the parties have been working diligently, given the volume of records at issue, we respectfully request an additional 60 days to apprise the Court of either the resolution of this matter or the necessity of cross-motions for summary judgment. Should motion practice be required, the parties will proceed in compliance with Your Honor’s individual practices concerning the filing of such motions.

We thank the Court for its consideration of this request.

**Granted. SO ORDERED.**

Date: 4/29/2020  
New York, New York

Mary Kay Vyskocil  
United States District Judge

By:

Respectfully,

GEOFFREY S. BERMAN  
United States Attorney

/s/ Stephen Cha-Kim  
STEPHEN CHA-KIM  
Assistant United States Attorney  
(212) 637-2768  
stephen.cha-kim@usdoj.gov

cc: Counsel for Plaintiffs (by ECF)